

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TOWN SPORTS INTERNATIONAL, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-12168 (CSS)

(Jointly Administered)

Ref. Docket No. 987

**STATEMENT OF THE DEBTORS WITH RESPECT TO THE MOTION
OF TOWN SPORTS INTERNATIONAL HOLDINGS, INC. FOR
ENTRY OF AN ORDER ENFORCING THE TERMS OF THE
CHAPTER 11 PLAN RELEASES AND INJUNCTION**

The above-captioned Post-Effective Date Debtors (the “Debtors”) hereby file this statement with respect to the *Motion of Town Sports International Holdings, Inc. for Entry of an Order Enforcing the Terms of the Chapter 11 Plan Releases and Injunction* (the “Motion”).²

1. The Debtors were aware that Gordon Rees represented TSIH in connection with the NYAG Action, as noted in the Walsh Declaration attached to the Motion, in addition to its representation of the Debtors.

2. Gordon Rees presented the proposed Settlement to the Debtors for its approval. The Plan Administrator approved the Settlement on behalf of the Debtors, which it was authorized to do pursuant to the authority granted to it under the Plan without further notice to or action, order, or approval by the Bankruptcy Court.

¹ The last four digits of Town Sports International, LLC’s federal tax identification number are 7365. The mailing address for Town Sports International, LLC is 399 Executive Boulevard, Elmsford, New York 10523. Due to the large number of debtors in these cases, for which the Debtors have requested joint administration, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <http://dm.epiq11.com/TownSports>, or by contacting the undersigned counsel for the Debtors.

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. At no time were the Debtors advised or made aware in any way that Gordon Rees purportedly was no longer simultaneously acting on behalf of TSIH or no longer acting with the authority of TSIH. The Debtors only became aware of any potential issue when contacted by counsel to TSIH with respect to its request to shorten notice of the Motion.

Dated: Wilmington, Delaware
April 7, 2021

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